

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Marcela Carlson, individually, as mother and next friend
of A.G., and as administrator of the estate of Richard
Gonzalez,

Plaintiff,

NOTICE OF MOTION

-against-

17-CV-172 (PAE)

The City of New York, Corizon Health Inc., Corizon
Health Clinical Solutions, LLC, Corizon Inc.,
Correctional Medical Associates Of New York, P.C.,
New York City Department Of Correction Officers
("C.O.") Javar Chatham, Terry Henry, Antonia Drake,
Captain Mohammed Shanu, C.O. John And Jane Does,
Dr. Frank Flores, Elmay Allen, LPN, Physician
Assistant Bernard, Phillip Germain, RN, and Medical
John and Jane Roes

Defendants.

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PLEASE TAKE NOTICE, that upon the accompanying (i) Memorandum of
Law in Support of the Motion to Dismiss the Amended Complaint by Corizon Health Inc.,
Corizon Health Clinical Solutions, LLC, Corizon Inc., Correctional Medical Associates Of New
York, P.C., Dr. Frank Flores, Elmay Allen, Jean-Luc Bernard, and Phillip Germain ("Corizon
and the Individual Medical Defendants"), and (ii) Declaration of Agnetha E. Jacob, dated August
25, 2017, in support of the same, Corizon and the Individual Medical Defendants will move this
Court, at the United States Courthouse for the Southern District of New York, located at 40
Foley Square, New York, NY 10007, at a date and time to be designated by the Court, for an
Order pursuant to Federal Rule of Civil Procedure 12(b)(6) dismissing the Amended Complaint
in its entirety as against Corizon and the Individual Medical Defendants, and awarding Corizon
and the Individual Medical Defendants such other and further relief as the Court deems just and
proper.

Dated: New York, NY
August 25, 2017

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Medical Defendants*
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By: /s/ Agnetha E. Jacob
Agnetha E. Jacob
Assistant Corporation Counsel

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